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FORT JAMES CORPORATION
11 AND RELATED ENTITIES

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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

20 CROWN PAPER LIQUIDATING
TRUST,

21 Plaintiff,

22 vs.

23 PRICEWATERHOUSECOOPERS
24 LLP fka COOPERS & LYBRAND, et
al.

25 Defendants.

Case Nos. C 02-03836 MMC
C 05-0798 MMC

**STIPULATION AND ORDER
CONTINUING DEFENDANTS'
MOTIONS FOR ATTORNEYS'
FEES PENDING
DOCUMENTATION OF
SETTLEMENT**

Current Date: March 2, 2007
Proposed New Date: April 27, 2007
Time: 9:00 a.m.
Courtroom: 7 (19th Floor)
Judge: Hon. Maxine M. Chesney

1 JEFFREY H. BECK, Liquidating
2 Trustee of the Crown Paper Liquidating
Trust,

3 Plaintiff,

4 vs.

5 FORT JAMES CORPORATION;
6 FORT JAMES OPERATING
COMPANY; FORT JAMES FIBER
7 COMPANY; FORT JAMES
INTERNATIONAL HOLDINGS LTD;
8 AND MCGUIREWOODS, LLP,

9 Defendants.

10
11 Plaintiff Jeffrey H. Beck, Liquidating Trustee ("Plaintiff"), and
12 defendants Fort James Operating Company, Fort James Fiber Company, and Fort
13 James International Holdings, Ltd., (collectively, "Fort James Defendants") and
14 McGuireWoods LLP ("MW," and collectively with the Fort James Defendants,
15 "Defendants", and collectively with the Fort James Defendants and Plaintiff, the
16 "Parties") stipulate as follows and respectfully request that the Court enter the
17 Parties' proposed order appended hereto.
18

19 WHEREAS, on July 12, 2004, the Court dismissed with prejudice Case
20 No. 02-03836 in favor of MW;
21

22 WHEREAS, on December 14, 2006, the Court entered judgment in
23 Case No. 05-0798 in favor of Fort James Defendants;
24

25 WHEREAS, on December 22, 2006, the Court approved the Parties'
26 stipulation to defer briefing and hearing dates for Defendants' to-be-filed attorneys'
27 fees motions;
28

1 WHEREAS, on January 26, 2007, MW and the Fort James Defendants
2 each timely filed an attorneys fees motion (collectively, the "Motions"), and
3 scheduled the hearings on the Motions for March 2, 2007;
4

5 WHEREAS, after the Defendants filed the Motions, the Parties have
6 been working on reaching an agreement to settle all litigation between and among
7 them, including this action and the Motions;
8

9 WHEREAS, the Parties are working to finalize settlement
10 documentation, which will be subject to the approval of the United States
11 Bankruptcy Court, Northern District of California, and in the meantime the Parties
12 wish to continue the hearings on the Motions because if the Parties' settlement is
13 approved, the Motions will be moot;
14

15 WHEREAS, with the current hearing date of March 2, 2007, Plaintiff's
16 oppositions to the Motions are due February 9, 2007 and Defendants' replies are due
17 February 16, 2007, and the Parties wish to avoid the incurrence of additional fees
18 with respect to the Motions;
19

20 IT IS HEREBY STIPULATED AND AGREED that the hearing on the
21 Motions shall be continued to April 27, 2007, and the briefing schedule for
22 Plaintiff's oppositions and Defendants' replies shall be continued in accordance with
23 the Local Rules for filing oppositions and replies.
24
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1 DATED: February 8, 2007

2 BEUS GILBERT PLLC

3
4 By /s/ Albert J. Morrison
5 Albert J. Morrison
6 Attorneys for Plaintiff

7
8 DATED: February 8, 2007 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP


9
10 By /s/ Theodore A. Cohen
11 Theodore A. Cohen
12 Attorneys for Fort James Defendants

13 DATED: February 8, 2007 KRIEG, KELLER, SLOAN, REILLEY & ROMAN
14 LLP

15 By /s/ James C. Krieg
16 James C. Krieg
17 Attorneys for Def. MCGUIRE WOODS LLP

18 Good cause appearing, IT IS HEREBY ORDERED that the hearing on the
19 Motions is continued to April 27, 2007, and the briefing schedule for Plaintiff's
20 oppositions and Defendants' replies is continued in accordance with the Local Rules
21 for filing oppositions and replies.

22
23 DATED: February 12, 2007

24
25 
26 Hon. Maxine M. Chesney
27 United States District Judge